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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: VOLKSWAGEN “CLEAN DIESEL”
MARKETING, SALES PRACTICES, AND
PRODUCTS LIABILITY LITIGATION

MDL No. 2672 CRB (JSC)

STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND CERTAIN
DISCOVERY DEADLINES

This Document Relates to:

The Honorable Charles R. Breyer

ALL ACTIONS (except securities actions)

1 WHEREAS, on February 25, 2016, the Court entered Pre-Trial Order No. 9
2 (Docket No. 1252), which, in Paragraph 4(B), requires the exchange of Rule 26 initial
3 disclosures on or before April 6, 2016;

4 WHEREAS, the Volkswagen Group and Porsche Defendants and the Plaintiffs'
5 Steering Committee have agreed that the deadline for serving Rule 26 initial disclosures as
6 between them will be April 15, 2016;

7 WHEREAS, the Volkswagen Group Defendants and Plaintiff the Federal Trade
8 Commission (the "FTC") have agreed that the deadline for serving Rule 26 initial disclosures as
9 between them will be April 8, 2016;

10 WHEREAS, Pre-Trial Order No. 9, in Paragraph 4(E)(ii), requires Defendants'
11 written responses and objections to requests for the production of documents to be served within
12 45 days after service of such requests;

13 WHEREAS, the Volkswagen Group and Porsche Defendants and the Plaintiffs'
14 Steering Committee have agreed to extend the deadline for the Volkswagen Group and Porsche
15 Defendants to serve written responses and objections to the Plaintiffs' Steering Committee's
16 pending document requests by nine days; and

17 WHEREAS, no previous request for an extension of these deadlines has been
18 sought.

19 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and
20 among the parties, that:

21 1. The Volkswagen Group and Porsche Defendants shall serve Rule 26 initial
22 disclosures on the Plaintiffs' Steering Committee, and the Plaintiffs' Steering Committee shall
23 serve their Rule 26 initial disclosures, by April 15, 2016.

24 2. The Volkswagen Group Defendants shall serve Rule 26 initial disclosures
25 on the FTC, and the FTC shall serve their Rule 26 initial disclosures, by April 8, 2016.

26 3. The Volkswagen Group and Porsche Defendants shall have an additional
27 nine days to serve their written responses and objections to the Plaintiffs' Steering Committee's
28 pending document requests.

1
2 Dated: April 7, 2016

Respectfully submitted,

3 By: /s/ Elizabeth J. Cabraser (with permission)

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8 *Plaintiffs' Lead Counsel*

9 Dated: April 7, 2016

Respectfully submitted,

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21 *Co-Liaison Counsel for the Volkswagen*
22 *Group Defendants*

1 Dated: April 7, 2016

Respectfully submitted,

2 By: /s/ Cari K. Dawson (with permission)

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*Liaison Counsel for Porsche Cars North
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8 Respectfully submitted,

9 By: /s/ Jonathan Cohen (with permission)

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16 Washington, DC 20580
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*Attorneys for Plaintiff Federal Trade
Commission*

18 * * *

19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

20
21 DATED: April 7, 2016.



22 CHARLES R. BREYER
23 United States District Judge
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ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the signatories.

Dated: April 6, 2016

SULLIVAN & CROMWELL LLP

/s/ Laura Kabler Oswell

Laura Kabler Oswell